

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MAINE**

EVERETT J. PRESCOTT, INC., )  
                                  )  
                                  )  
Plaintiff,                  )  
                                  )  
                                  )  
v.                             )  
                                  )  
                                  )  
TIMOTHY J. BEALL,            )  
                                  )  
                                  )  
Defendant.                  )  
                                  )

Civil Action No. \_\_\_\_\_

**VERIFIED COMPLAINT FOR TEMPORARY RESTRAINING ORDER AND OTHER  
RELIEF**

Plaintiff Everett J. Prescott, Inc. (“EJP”), by and through its undersigned counsel, files this Verified Complaint against Timothy J. Beall (“Beall” or “Defendant”). In support thereof, Plaintiff states as follows:

**NATURE OF THE CASE**

1. Plaintiff brings this action against its former employee, Defendant Timothy J. Beall, seeking a temporary restraining order to prevent further harassment of its current employees.
2. As detailed herein, since terminating Defendant’s employment on November 6, 2024, Defendant has engaged in an increasingly threatening campaign of harassment against EJP and its current employees.
3. Despite requests to cease his harassing conduct, Defendant continues to send threatening text messages and emails to EJP employees and post defamatory statements on social media.
4. Defendant’s conduct has caused current EJP employees to suffer substantial emotional distress and other harm.

5. EJP seeks relief from this Court to secure the safety of its employees and property given Defendant's escalating threats and harassment.

**THE PARTIES**

6. EJP is a Maine corporation with its principal place of business in Gardiner, Maine.

7. Upon information and belief, Beall is a citizen of the Commonwealth of Massachusetts, residing in Shrewsbury, Massachusetts.

**JURISDICTION AND VENUE**

8. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1332 as the parties are citizens of different states and the amount in controversy exceeds \$75,000.

9. Venue is proper in this district under 28 U.S.C. § 1391 because a substantial part of the events giving rise to the claim occurred in this district.

**FACTUAL ALLEGATIONS**

10. EJP employed Defendant as an inside sales representative from January 2, 2024 to November 6, 2024.

11. EJP terminated Defendant's employment on November 6, 2024 due to poor performance and excessive absences in violation of EJP's attendance policy.

12. Since termination, Defendant has engaged in a pattern of harassment against Plaintiff's current employees, including sending threatening messages and making defamatory statements.

13. On November 8, 2024, Defendant's former spouse filed for divorce in the Commonwealth of Massachusetts Probate and Family Court, Docket No. WO24D2415DR.

14. Upon information and belief, Defendant is also the subject of an Abuse Prevention Order (Worcester Probate & Family Court – Docket No. 24RO612AB) evidencing his volatile and potentially violent nature.

15. On December 4, 2024 at 9:00 a.m., Defendant emailed EJP Director of Human Resources, Paul S. Van Savage (“Van Savage”) a veiled threat about legal action related to his separation from EJP. Defendant wrote,

I gave you multiple opportunities, and your demeanor just shows that you are not qualified for your position in the company (as well as countless other individuals) I feel bad for Peter that this great company he built was taken over by his spoon fed son who is going to allow his employees to destroy the name his father and grandfather built, but hey like I said previously, I tried to give you guys a chance to make things right, thankfully there are laws and my lawyer has a LIST of them EJP violated and violates willingly his quote “it’s hilarious how these large companies think the law doesn’t matter, then they have their day in court and plead for mercy.” He’s an absolute pitbull, so we shall see. Be good Paul, see ya in court buddy (I’ll be the one grinning from cheek to cheek)

(sic).

16. On January 1, 2025 at 12:23 p.m., Defendant sent Van Savage an email calling him derogatory names, including “little bag of shit,” “a fuckin idiot,” and a “low life scum bag.” Defendant further threatened to attack EJP like the January 6 “storming of the Capitol Building.” Defendant’s email, in full, stated,

Happy New Years you little bag of shit! Hope you’re ready for the fuckin fireworks that are gonna pop off next week.. Gonna start filing one by one, I can’t wait to see my lawyer absolutely mop the floor with you and that entire fuckin organization.. I’m even volunteering to be the one to serve Dave Hirsch the wrongful death lawsuit that he has been avoiding since 2018.. Buddy this ain’t Maine, this is Massachusetts, we invented America and we still follow the laws.. Being such a small person at a “big” company (if u want to call it that) you may think that you are invincible and protected.. you’re a fuckin idiot, I will not stop until you’re gone, James is gone, fuck it I’ll wipe Team EJP out of central Massachusetts with the connections I have and people I know. Already had multiple customers call ME and ask wtf happened, I been shooting it straight with them telling them how much of low life scum bags you all are, they think it’s fucked why James fired me, but hey now he has that new kid from Brockton (which he already can’t stand!!!) maybe James is the problem, Oh nah a 27 year old with zero life experience, no

communication skills, maybe 1 or two actual friends, and only ever worked at EJP and a campground gotta be management material!! Oh he's Dave Hirsch half ass nephew (GOT IT MAKES SENSE) nepotism ALWAYS works out so well they say... well whatever, you'll see.. I cannot wait to see the look of pure embarrassment on Steven Prescotts face when my lawyer(s) EXPOSE Team EJP for the 1/2 dozen STATE laws I documented them breaking in the 10 months I was there, aswell as 2 FEDERAL that I have right now and working on the third.. If for some reason anyone finds themselves at the Shrewsbury Branch, bring a couple boxes of Friskers for the cats that James bought for him and Taylor (they bring them in for a play date once a week HAHAHHAHAHA u can't fuckin make this shit up Paul!!!!) Meanwhile you have an outside sales guy who fell flat on his face this year (I outsold him prolly 2-1 from inside the fuckin building) being managed by someone who has locked himself in the office of the new GIRL for 6 months, even been in there allllll during Cycle Count.. Again, I have MULTIPLE CUSTOMERS I talk to..

Keep that fuckin Terminal Train Rollin tho baby! Only helpin me out the more hands off you are in this it's great, actually should prolly be thanking you. You've let this train build enough potential energy to make it over that hill, Monday Jan 6 will be 4 years since the storming of the Capitol Building, it will be a day in EJP history as well, when I file my first case in small claims court for something u still have yet to look into. Not only was the commission changed on the new contract (because the last girl u hired at Shrewsbury who quit CUS JAMES) I was hired on and signed the old one.. I recieved a check for my first commission pay and it was \$0. Small claims court will figure that one out and then Superior Court will expose the rest.

They have brothers and sister cats that they bring to work now! Bahahahaha, and you clearly don't care about conflict of interest in him buying her a car, wooooooooof you guys really are something else man, thankfully Laws are Laws, being in HR you'd think you'd understand that, but here we are.. Thankfully all the personal actual REAL LIFE SHIT I've been dealing with has started to settle down, and whattaya know it's all working out in my favor because much like this situation I did nothing wrong.. I'm going into 2025 with 4 LLCs u der my name with plans to start 3 more businesses by March.. I don't give a shit about getting fired from EJP, I could go get a better job at Core&Main tomorrow if I wanted to, it was a blessing now I get away from that toxicity with the ability to focus on my own businesses. I will be building my brands and businesses while simultaneously exposing corruption, corporate greed, tax evasion, wrongful termination, and WRONGFUL DEATH that has plagued EJP ever since they moved their way into Central Massachusetts.. Peter left Massachusetts, he shoulda stayed out.

(sic).

17. On January 25, 2025 at 10:47 a.m., Defendant emailed Van Savage enclosing an

"affidavit" and threatening legal action while attacking Mr. Van Savage and EJP as follows:

Attached is a copy of the affidavit my self and my attorneys (Aloise & Wilcox) will be filing on my behalf this week. They represent CVS, Price Chopper, Home Depot (just to name a few). I would like to take this opportunity to once again express my concern with your utter unprofessionalism and ineptitude to do your job, even at the simplest form. I was ABUSED by James and EJP as a whole, then when I reached out just to talk to HUMAN RESOURCES about my experience it was met with instant hostility. I wanted to (at first) save my job, thankfully that didn't happen because after seeing the ACTUAL culture of EJP, which mind you is EXTREMELY RACIST, I would NEVER want to work for such disgusting individuals. Your ineptitude is what is getting us to this point, thankfully for me the top lawyer in Central Massachusetts happens to be the father of a childhood friend, this has been made personal for him now and EVERYTHING will be brought to court. Feel free to forward this over to the lawyer you copied on one of our emails, I don't care enough to search for it. Here's the affidavit, you have until Tuesday to respond. I look forward to hearing your pathetic response like history has shown you are only capable of producing.

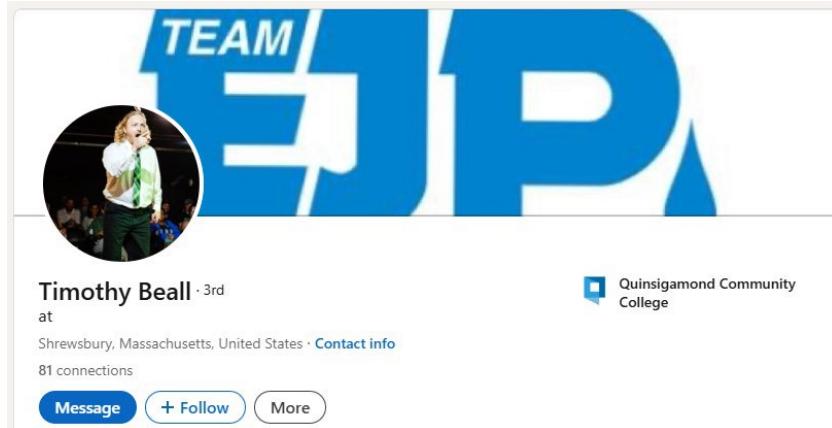
(sic).

18. Defendant had seemingly quieted down until he resurfaced on February 24, 2025 to post a public comment on Van Savage's LinkedIn post falsely accusing EJP of condoning racism, falsely accusing an EJP employee of committing a crime, and falsely accusing EJP of preventing him from attending court (as seen in screen image below).

The screenshot shows a LinkedIn post with the following details:

- Impressions:** 776
- View analytics:** Link
- User:** Timothy Beall (3rd+ at)
- Post Content:** "Workplace culture at EJP is having a BurgerKing crown be given to the employee with the most racist comment of the day at Branch 120. 614 Hartford Tpk Shrewsbury, MA. Nepotism runs rampant at EJP, which is why James Peterson went from cleaning toilets at a campground to Branch Manager. His uncle who has been ducking summons for a wrongful death case from an EJP employee since 2018 is the Operations Manager. The Business Ethics are nonexistent in this company, that should have been the topic, not Wmployee Retention. But just like Team EJP to say about it instead of be about it. Preach family oriented company, then fire someone for attendance due to a court order to be in court for a case involving the safety of THEIR CHILD. You are pathetic Paul, which is why you fit in so well within the culture at EJP"
- Engagement:** 1 Like | 1 Reply

19. Defendant was also using a trademarked "Team EJP" logo as his LinkedIn banner:



20. As such, on February 27, 2025, EJP, through its undersigned counsel, sent Defendant a cease-and-desist letter asking him to stop harassing Van Savage and to remove any defamatory public postings. *See Exhibit 1.*

21. On February 27, 2025 at 3:07 p.m., Defendant emailed EJP's counsel's paralegal stating, "EJP is full of cowards and the scum of the Earth. If you had any backbone and stood by the LAW you would not represent them, I have faith justice will prevail and if not on this Earth then God will sort it out when that time comes." (sic).

22. On February 27, 2025 at 3:42 p.m., Defendant emailed EJP's counsel's paralegal again. This time, Defendant wrote,

Wait wait wait wait wait!!! That LinkedIn post is what this is referring to !!!!!?!?!? BAHAHAHAHAHAHAHAAHAAH OH MY GOD!!!! You have to be joking right? This is going to be laughable in court.. you understand that you are replying to allegations of sexual harassment and direct racism in the work place to an employee who is in a biracial family, WITH A CEASE AND DESIST??????!?!? Hahahahahah you practice law?? Like seriously actually practice law? Every single page in this story just reveals more and more pre how obviously it is written as a comedy (by a 3rd grader). Thank you for this!! Thank you! I will go file my 7 lawsuits this week. Oh my God THANK YOU, you absolutely made my day!!!

WOW! It's like I'm playing Tee-ball (as a 35 year old, against children), let me say it again.....WOW!

(sic).

23. Five minutes later, at 3:47 p.m., Defendant emailed EJP's counsel's paralegal again. This time, Defendant wrote,

"Fueled by Intergrity" Pffffft also laughable. If a single person at your firm had one single molecule of "integrity" you would look at the entire situation and not what Paul shared with you. Like the fact he sent me copy and pasted sections of the old employee handbook as to why I wasn't getting my commission check that was coming days after my termination.. Wow, look up the definition of intergrity when you get a chance, LOL

(sic).

24. Also on February 27, 2025, Defendant sent a text message to EJP manager, James Peterson invoking Whitey Bulger and threatening Peterson that "YOU PICKED THE WRONG GUY." Defendant's message stated,

Hey you stupid rat fuck, my grandfather Sgt James Murray in the 1980s was undercover in Whitey Bulger gang, in 89 he found out he was having his first grandkid (ME!) and wanted to protect his family, for the work he did he was named the HEAD of the Mass State Police Crime Unit, and indicted Whitey Bulger in 1991 3 months before my second birthday. He retired as the HEAD of the Mass State Police Organized Crime Unit and went into 20+ years Private Investigation work..

If you think I don't know ALL THERE IS TO KNOW ABOUT YOU AND EVERYONE you know at this point you're dumber than you look..

Stop chasing Taylor, your hand will get you into far less trouble. Tell your uncle to stop hiding from the wrongful death case (piece of shit loser)

Wanted to update you that I'm in the process of making Steven Prescott decide if James Peterson is going to be the hill his company and family name dies on.

You're a sexual predator, loser, and just an overall piece of shit.. enjoy the calmness for now, when I'm done with you, you are going to be begging that campground to let you come clean their toilets again, ONE of the cases I have in you will deem you UNEMPLOYABLE, the 7 other ones, will just be my trophy's...

YOU PICKED THE WRONG GUY

(sic).

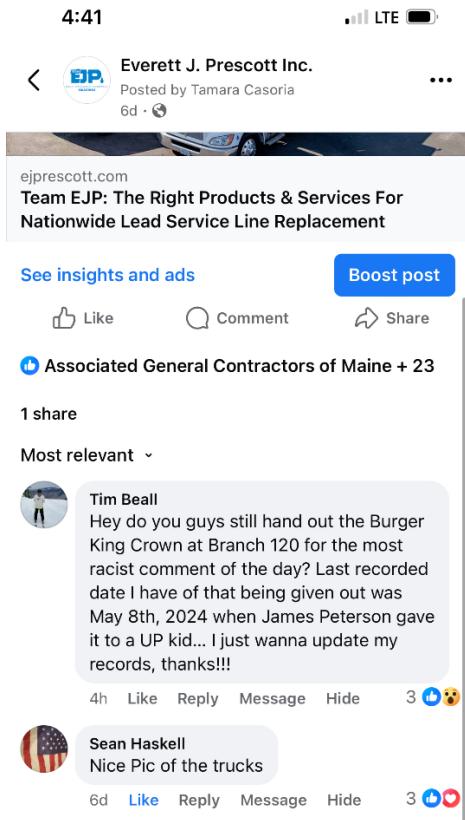
25. At 5:20 p.m. on February 27, 2025, Defendant sent EJP's outside counsel's paralegal his fifth email in approximately two hours stating,

One more thing, I don't even use LinkedIn. Last time updated my page was when I started working at that Hell hole. I only went in there to reach out to Paul cus he's such a fuckin little pussy ass bitch that he wouldn't respond to my emails asking to have a conversation about my wrongful termination.. I CANNOT WAIT to have my day(s) in court with you people. I am going to use the Worcester Superior Court to completely DISMANTLE that entire company, WITH FACTS AND EVIDENCE mind you. I'll quote my lawyer "These big companies are hilarious man, I see it all the time. They think because they have money, some power, and have been around for a while it gives them this hilarious self confidence that they can do whatever they want and get away with it. Making them squeal like the swine they are give me utter satisfaction. Based off what you have told me and the evidence you have presented and history of crimes they committed, this should be an absolute field day."

In this world there are winners and losers in every situation, I don't know you personally and I give everyone the benefit of the doubt, so I genuinely feel bad for you that you are in the losing side. I have Paul, Steven, EJP, and even James Peterson the benefit of the doubt over and over again.. Now they're all going to throw up uncontrollably when they start getting these summons. Thank you again for making my day, I look forward to meeting you, I'll be the guy using State and Federal Laws to absolutely dismantle a corrupt company, my lawyers (best in the area) will also have the opportunity to show you how Law is practiced..

(sic).

26. Also on February 27, 2025, Defendant posted a public comment on EJP's Facebook page falsely accusing EJP of rewarding racism in the workplace (as seen in image below):



27. Later on February 27, 2025, Defendant changes his LinkedIn background photo to further defame EJP as it read “Not EJP (They hire sexual predators and are run by corrupt little people).” (images below)



28. At 7:50 p.m. on February 27, 2025, Defendant sent EJP's outside counsel's paralegal a sixth email – his longest and most alarming message of the day – stating,

I've never in my life and all my research stumbled upon a time (prolly first in recorded history) where a female employee feels so unsafe at her workplace that she reaches out to her ex (whom she had no intent of ever speaking to again) to get in contact with her boss to stop harassing her. This same boss whom (I have documentation to PROVE) bought her a car, went out and bought the brother cat of the cat she just got and brings it in twice a week for play dates! THEN this little rat fuck James Peterson has to get a restraining order in the guy (because the guys prolly trying to save his ex girlfriend for serious abuse and torture) and this little weasel fires someone cus of his fear of being exposed, then when that person reaches out to HR (in a calm manner mind you) saying "I feel I was wrongfully terminated and was planning to call you guys in 30 min when you got to work to talk about PFMLA for the situation I'm going through in my personal life. AND THEN HR (which is run by this person who I'm not sure if you met him, but if you do you will realize is the most pathetic poor excuse for a man that God could have made) contacts a lawyer to send a cease and desist about a fuckin LinkedIn post!!!! HA Ha Ha Ha Ha!!!! Please, I would love for you to quote Law and tell me exactly what violation I did, I'll wait..... And after that we could have an actual serious discussion about the PAGES and PAGES of State and Federal Laws that EJP has violated throughout the years, including I would assume "aiding and abdding" (in multiple instances) see here is the thing when you have a bunch of little people

running a company they have no business running and are only there because their grandfather started a company decades ago then the family split and went separate ways with the pathetic little rat section of the Prescott family retreating to Maine where they felt they could get away with the corruption they were so accustomed to in the Waterworks industry..

EJPathetic is a stain on this Great Country and what it represents. I will stop at nothing until every single violation of law I have uncovered so far they have committed is exposed. I will let judges decide the fate of the company, not some half-asses HR department that has a history of violations Equal Employment Opportunity Laws, like you know REAL violations (not a fuckin LinkedIn post). Steven Prescott has one opportunity to actually address these issues like a man and not avoid them like the little coward that he is and has proved for years when it comes to anything like this. The post I commented on was a post Paul shared about employee retention, I was offering my advice, with FACTS of how to attain employees, starting with addressing these issues cancer James Peterson. But thankfully there are courts for that and my family has copious amounts of money and like I said, I will stop at nothing and pool all resources including the files from the private investigators I have on multiple people inside that company. My grandfather was undercover in the Winter Hill Gang before becoming the Head of the Mass State Police Organized Crime Unit and indicting Whitey. He retired and had a second success career as a PI and made A LOT of friends... I have legitimate PAGES on every single person I mentioned, they all have skeletons in their closet and they all have been continuing to act like pieces of shit since my wrongful termination on 11/6/24... If nothing else pass the message along that it's too late for them to burn the files, they should have thought this through before terminating me, although they had no idea of my upcoming termination, James Peterson just did it on his own for fear of all this shit coming out, welllllp unfortunately for the company James is somehow even dumber than he looks

(sic). See Exhibit 2.

29. Several minutes later, at approximately 8:00 p.m. on February 27, 2025, Defendant sent a threatening message to EJP President Steve Prescott, referencing the Ides of March, the date on which Julius Ceasar was assassinated:

I suggest you not be SHORT sighted, and get back to me by oh to make it fun let's say March 15th. With the amount of clowns you have working for you, the fact everything you have was given to you on a silver platter, and being from Maine I can assume you aren't the brightest, look up the Ides of March. Then look into your company, Branch 120, and James Peterson. You're welcome for the warning, it was more than that spineless Porto Potty scrubber James Peterson gave me, but when I bring him to court he will be UNEMPLOYABLE once he is exposed. Paul VanSavage's (also a tiny pos, there must be a farm up there that pumps you guys

out) knowledge of the allegations against James and the nothingness he has done about it is going to taint your company and last name, now that you are aware aswell your next move will ultimately decide the fate of said company.

(sic).

30. Also at approximately 8:00 p.m. on February 27, 2025, Defendant sent another threatening messages to Mr. Peterson stating,

My lawyers and I are going to have an ABSOLUTE BLAST tearing you from piece to piece... Nobody likes you, and the people you work with every day legitimately HATE you.. you did ALL of this to yourself man. My best advice to you would be to just drown yourself in alcohol tonight, because today was the best day you're going to have for the rest of your pathetic existence.. I would also quit golf, not only do you absolutely suck at it, but this coming golf season every single course you could even think to play at besides shitholes near where you live I guarantee I know atleast 3 people at.. You were afraid I was gonna fight you or something when you fired me? Hahah nah man, if I did that then the beating would've given you would've felt like the greatest gift anyone could ever give you (besides Taylor's clam) compared to wait awaits you in the courtroom pal.. if you choose not to drown in alcohol then the next best thing would be to call that camp ground you use to clean toilets at because when I'm done with you pal you're gonna be UNEMPLOYABLE!! No one will hire someone who couldn't make it 7 months as a manager without sexually harassing the first female employee they came across.. you're a predator, a creep, and most of all a fuckin LOSER!

(sic).

31. Given the volume of messages, their hostile tone, and the threats contained therein, including the veiled threat of death, EJP's employees, Van Savage, Peterson, and Prescott, as well as EJP's outside counsel reasonably fear for their safety.

**COUNT I**  
**TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

32. EJP incorporates by reference the allegations contained in paragraphs 1 through 31 as if fully set forth herein.

33. Defendant's actions have caused and continue to cause irreparable harm to EJP and its employees.

34. As evidenced by Defendant's repeated threatening messages, Defendant will continue to engage in this hostile conduct absent judicial action.

35. EJP has suffered or will imminently suffer irreparable injury and damage, including harm to its goodwill and business expectations, which will continue during the pendency of this matter if Defendant is not enjoined from further unlawful conduct.

36. EJP's employees have suffered or will imminently suffer irreparable injury and damages, including emotional distress, which will continue during the pendency of this matter if Defendant is not enjoined from further unlawful conduct.

37. The irreparable damage EJP and its employees are suffering because of Defendant's above-described conduct is continuing and mounting.

38. The granting of an order restraining Defendant from the above-described actions will not cause financial loss or damage to Defendant but will protect EJP's business and its employees from further irreparable harm.

39. EJP has provided notice to Defendant although this Court may grant a Temporary Restraining Order without notice per Fed.R.Civ.P. 65(b)(1).

40. It is necessary that the above-described acts and conduct of Defendant be restrained before further notice is given and a hearing is held in this proceeding, to prevent immediate irreparable injury, loss and damage to EJP and its employees.

41. Greater damage will be inflicted upon EJP and its employees by the denial of the immediate injunctive relief sought herein than upon the Defendant by the granting thereof.

42. There is a substantial likelihood that EJP will prevail on the merits of its claims.

43. EJP has no adequate remedy at law that could fully compensate it for the harms occurring and threatened. Preliminary and permanent injunctive relief are appropriate.

44. EJP will provide a bond in any amount deemed reasonable by the Court if necessary.

45. Accordingly, EJP is entitled to this equitable relief and an order prohibiting Defendant from (a) contacting EJP's current employees in any form; (b) entering EJP's company premises; and (c) communicating with EJP or its employees through any means.

**COUNT II**  
**DEFAMATION PER SE**

46. EJP incorporates by reference the allegations contained in paragraphs 1 through 45 as if fully set forth herein.

47. Defendant negligently, recklessly, and/or intentionally made false statements publicly on social media about EJP's reputation, business, and character.

48. Specifically, Defendant has falsely stated that EJP rewards racism, hires sexual predators, commits crimes, and aides and abets criminal activity.

49. Defendant's public statements have the tendency to injure and have in fact injured EJP's reputation.

50. As a direct and proximate result of Defendant's defamation and slander of EJP, EJP has been injured in its professional standing and reputation.

51. As a direct and proximate result of Defendant's defamation and slander, EJP has incurred damages.

WHEREFORE, EJP requests that the Court enter judgment in its favor and award compensatory damages, including lost earnings opportunities, attorney's fees and costs, and such other and further relief as the Court deems just and proper.

**COUNT III**  
**TORTIOUS INTERFERENCE WITH ADVANTAGEOUS ECONOMIC**  
**RELATIONSHIP**

52. EJP incorporates by reference the allegations contained in paragraphs 1 through 51 as if fully set forth herein.

53. EJP has a reasonable expectation of continued business relations with its existing and prospective clients.

54. Defendant has engaged in the above-described conduct for the purpose of harassing and interfering with the conduct of EJP's business, and with intent to hinder, delay, prevent, threaten, intimidate, and put fear in EJP's employees.

55. As a result of the actions described above, Defendant has wrongfully and without justification, tortuously interfered with the productivity and business expectancies between EJP and its employees, customers, suppliers, agents, and contractors.

56. Defendant's actions have damaged, and, if unrestrained by this Court, will continue to damage the existing and prospective contractual relationships or business expectancies of EJP.

57. By tortiously interfering with EJP's business, Defendant caused and will continue to cause EJP actual, immediate, and irreparable harm for which EJP has no adequate remedy at law.

58. As a result of Defendant's tortious interference, EJP is entitled to preliminary and permanent injunctive relief and damages in an amount to be proven at trial.

**COUNT IV**

**INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS**

59. EJP incorporates by reference the allegations contained in paragraphs 1 through 58 as if fully set forth herein.

60. Defendant engaged in conduct that intentionally or recklessly caused emotion distress to Plaintiff and its employees, and Defendant was certainly or substantially certain that severe emotional distress would result from his conduct.

61. Defendant's conduct was so extremely outrageous so as to exceed all possible bounds of decency and must be regarded as atrocious and utterly intolerable.

62. EJP and its employees suffered and continues to suffer severe emotion distress as a result of Defendant's conduct.

WHEREFORE, EJP demands judgment against Defendant in an amount which will fairly compensate it for its damages as well as punitive damages, and any other relief deemed just plus an award of costs and attorney's fees.

**PRAYER FOR RELIEF**

WHEREFORE, EJP requests judgement and prays that:

1. Defendant be restrained and/or enjoined pending the final determination of this matter, from committing the following acts:
  - a) Contacting EJP's current employees in any form;
  - b) Entering EJP's company premises;
  - c) Communicating with EJP or its employees (or outside counsel's employees) through any means; and
  - d) Posting any defamatory content on public social media sites
2. This Court set this matter for a hearing to extend the Temporary Restraining Order to a temporary injunction for the pendency of this action enjoining Defendant from the activities set forth in Paragraph 1 above;

3. This Court enter a permanent injunction enjoining Defendant from the activities set forth in Paragraph 1 above;
4. This Court enter on order providing that all sworn and duly constituted federal law enforcement officers enforce the order to the extent of their lawful authority;
5. This Court enter an order awarding EJP reasonable attorneys' fees and costs; and
6. This Court enter an order awarding such other and further relief this Court may deem just, equitable, and proper.

**DEMAND FOR JURY TRIAL**

EJP demands a trial by jury on all issues so triable.

Dated: February 28, 2025

*/s/ Melinda J. Caterine* \_\_\_\_\_  
Melinda J. Caterine, Bar No. 7129  
Steven J. Silver, Bar No. 5946  
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*Attorneys for Plaintiff*

**VERIFICATION**

I, Paul S. Van Savage, am employed by Everett J. Prescott, Inc., as its Director of Human Resources. I have personal knowledge of the matters alleged in this Verified Complaint. I have read the foregoing allegations and statements of facts, and they are true based upon my personal knowledge or upon information provided to me at my request by other employees of Everett J. Prescott, Inc., acting at my direction for the purpose of gathering information for this Complaint.

  
February 28, 2025

**CERTIFICATE OF SERVICE**

I, Melinda J. Caterine, hereby certify that I electronically filed the foregoing document via email on the date noted below, and emailed and sent first class mail to the following:

Timothy Beall  
42 Woodway Drive  
Shrewsbury, MA 01545

Dated: February 28, 2025

Respectfully submitted,

*/s/ Melinda J. Caterine*

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